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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(HON. ROGER BENITEZ)**

17 UNITED STATES OF AMERICA, ) Case No. 08-CR-0511-4-BEN  
18 Plaintiff, )  
19 v. ) NOTICE OF MOTION AND MOTION  
20 MAGGIE SIEBEN, ) FOR DISCOVERY; TO DECLARE  
Defendant. ) CASE COMPLEX; AND FOR LEAVE  
to file further ) TO JOIN MOTIONS FILED BY  
motions ) OTHER COUNSEL; AND FOR  
DATE: ) LEAVE TO FILE FURTHER  
TIME: ) MOTIONS  
DEPT:

21 TO: PLAINTIFF UNITED STATES OF AMERICA AND ITS ATTORNEY OF  
22 RECORD, KAREN P. HEWITT, UNITED STATES ATTORNEY FOR THE SOUTHERN  
23 DISTRICT OF CALIFORNIA; AND ASSISTANT U.S. ATTORNEY TIMOTHY F.  
24 SALEL.

25 Please take notice that at the above designated time and place, defendant Maggie  
26 Sieben will move the court for an order compelling discovery in the instant case with respect  
to the items set forth in the attached memorandum of law, based upon the constitutional,  
statutory, and judicial authorities cited herein. Defense counsel will further move the court to  
have case declared complex and for leave to join the motions filed in this matter by other  
counsel unless specifically exempted therefrom, and for leave to file further motions.

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Said motion is based upon the instant notice of motion, the attached memorandum of law, and on such evidence and argument as may be presented at the hearing on the motion.

Date: April 7, 2008

Respectfully submitted,

/s/ Paul W. Blake  

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